

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:

LOUIS D. LANNI :CHAPTER 13
xxx-xx-3286 :CASE NO. 23-11122/MDC

Debtor.

U.S. Bank National Association as :
Legal Title Trustee for Truman 2016 :
SC6 Title Trust :
Movant, :
v. :
LOUIS D. LANNI :
Debtor, :
And :
Kenneth E. West, Esquire :
Respondents.

**MOVANT U.S. BANK NATIONAL ASSOCIATION AS LEGAL TITLE
TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST'S WITNESS LIST
FOR AUGUST 14, 2023 TRIAL**

Pursuant to this Honorable Court’s May 23, 2023 Order [Docket No. 20], below is the above-captioned Movant, U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust’s (“Movant”) intended witness information for the trial scheduled for August 14, 2023.

1. **Name and Title of Remote Witness** – Darla Martin, designated representative of Movant.

- a. **General Topic of witness testimony:** Ms. Martin will testify as to the amount of Debtor's post-petition mortgage payment and the status of post-petition mortgage payments.
- b. **Email address:** dmartin@rushmorelm.com
- c. **Geographical Location:** Carmel, IN, USA
- d. **Type of Location:** Home office
- e. **Other people present** – None.
- f. **Exhibits the party expects to utilize:** The mortgage payment statement.
- g. **Other documents Accessible to Witness:** Witness will review account histories to prepare for her testimony as to the amount of mortgage payment and status of post-petition mortgage payments.

- 2. Name and Title of Remote Witness – Louis Lanni, Debtor
 - a. **General Topic of witness testimony:** Mr. Lanni will be examined as to inconsistencies in his trial deposition as to evidence admitted into the record.
 - b. **Email address:** snapcount999@gmail.com
 - c. **Geographical Location:** Philadelphia, PA, USA
 - d. **Type of Location:** Home
 - e. **Other people present** – None.
 - f. **Exhibits the party expects to utilize:** M-1 through M-31
 - g. **Other documents Accessible to Witness:** N/A
- 3. **Name and Title of Remote Witness** – Shelley Virgilio, employee with Romano, Garubo & Argentieri
 - i. a. **General Topic of witness testimony:** Ms. Virgilio will testify as to the service of the rent attornment notices on Tenants and Debtor's foreclosure counsel, as well as the Rent Receiver Petition filed by plaintiff in State Court and

Debtor's motion for reconsideration of the State Court Order removing the foreclosure case from conciliation.

- b. **Email address:** svirgilio@rgalegal.com
- c. **Geographical Location:** Woodbury, NJ, USA
- d. **Type of Location:** Office
- e. **Other people present** – None.
- f. **Exhibits the party expects to utilize:** M-8 through M-12; M-28 through M-31.
- g. **Other documents Accessible to Witness:** N/A

4. Movant reserves the right to supplement, amend or delete any of its witnesses identified and to otherwise amend or supplement these disclosures prior to the trial and/or on rebuttal. Movant further reserves the right to identify additional witnesses in response to replies or witness list filed by other parties.

ROMANO, GARUBO & ARGENTIERI
Counselors at Law, LLC

Dated: 8/7/23

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